

April 24, 2008

Mr. Brian Bennett
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Keystone America PAC
FEC ID No. C00439992

Dear Mr. Bennnett:

This is in response to your letter dated April 2, 2008 concerning the Year End Report (10/18/07-12/31/07) of the above referenced Committee.

You ask about expenditures for ""Catering,"" ""Fundraising Consulting Services,"" and ""Fundraising Consulting Services & Travel."" These expenditures were for fundraising on behalf of Keystone America PAC (the ""Committee"") and were not made on behalf of any specifically identified federal candidate.

You also ask about expenditures for ""Postage & Catering"" and ""Printing."" These expenditures were made to conduct the Committee's own activities and did not contain express advocacy.

Finally you ask about administrative expenses. The Committee is a small committee that has few administrative expenses. Currently, it has no office or paid staff and relies primarily on consultants and volunteers to administer the Committee's activities. All of the expenses incurred to operate the Committee have been reported as federal operating expenditures on the Committee's FEC reports.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Marc Elias
Counsel to Keystone America PAC
